



Department of Energy
Office of Legacy Management

SEP 01 2010

Ms. Dana Bahar, Manager
Superfund Oversight Section
New Mexico Environment Department
P. O. Box 5469
Santa Fe, NM 87502-5469



648418

Subject: U. S. Department of Energy Comments on Draft Geochemical Analysis Report

Dear Ms. Bahar:

The U.S. Department of Energy, Office of Legacy Management (DOE-LM) appreciates the opportunity to peer-review the May 2010 draft report titled "Geochemical Analysis and Interpretation of Ground Water Data Collected as part of the Anaconda Company Bluewater Uranium Mill Site Investigation (CERCLIS ID NMD007106891) and San Mateo Creek Site Legacy Uranium Site Investigation (CERCLIS ID NMN00060684)." General comments follow and specific comments are enclosed.

1. It is our understanding from your transmittal letter that the draft report is a technical paper presenting the basis for use of certain isotopes to differentiate sources of groundwater contamination, and that the report is not intended to be finalized. As the draft report has been made public, DOE-LM requests that the report be revised to clearly state this fact as well as the purpose of the draft report.
2. DOE agrees with the study's shortcomings: limited sampling data, a limited number of wells from a regional perspective, and inclusion of wells having unknown completion information. Although conclusions are caveated, it is strongly encouraged that any outside use of data from the study also be caveated.
3. It is recommended that the report be revised to address comments received from this peer review. If this is not possible, the review comments should be added as an addendum to the public report.
4. It is our understanding that the site investigations done at the Bluewater mill site were conducted in 2008 and 2009. Please provide the exact references for these studies in the draft report. DOE-LM also understands that the draft report is not an official CERCLA document per se, but that it was prepared with CERCLA funds. This distinction needs to be made clear in the report.
5. DOE-LM has been evaluating the use of isotopic signatures as well, and believes the concept has merit. DOE-LM agrees with having discussions among NMED, EPA, and NRC regarding a technical team approach for evaluating the use of isotopic signatures and the interpretation of data.

2597 B 3/4 Road, Grand Junction, CO 81503

☐

99 Research Park Road, Morgantown, WV 26505

1000 Independence Ave., S.W., Washington, DC 20585

☐

11025 Dover St., Suite 1000, Westminster, CO 80021

10995 Hamilton-Cleves Highway, Harrison, OH 45030

☐

955 Mound Road, Miamisburg, OH 45342

232 Energy Way, N. Las Vegas, NV 89030

☐

REPLY TO: Grand Junction Office


SEP 01 2010

Ms. Dana Bahar

-2-

Rich Bush is the DOE-LM contact for these discussions. He can be reached at 970-248-6073 or at Rich.Bush@lm.doe.gov. Also, April Gil is the DOE-LM site manager for the Bluewater and Ambrosia sites, and can be reached at 970-248-6020 or April.Gil@lm.doe.gov. Please let me or Rich know of questions regarding our review.

Sincerely,


Tracy Plessinger
Project Manager

Enclosure

cc w/enclosure:
L. Chang, NRC
L. Price, EPA Region 6
R. Bush, DOE-LM
E. Dixon, NMED
D. Mayerson, NMED
A. Gil, DOE-LM
T. Pauling, DOE-LM
File: BLU 410.02 (rc-grand junction)